

# **New Hampshire Special Education Audit Report**

## **SAU 33**

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## **Final Report**

November 21 2000

**Visit Conducted on: October 3 - 6, 2000**

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# **New Hampshire Special Education Audit Report**

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Note: *It should be noted that suggestions are not considered corrective actions and therefore are given as technical assistance. The district is not mandated to implement them.*

# **New Hampshire Special Education**

## **Audit Report of SAU 33**

### **I. INTRODUCTION:**

A New Hampshire Department of Education Special Education Audit visit was conducted in SAU 33 comprised of the following schools: Lamprey River Elementary School, Iber Gove Holmes Middle School, Raymond High School. The visiting team met on October 3 - 6, 2000 in order to review the status of special education services being provided to eligible students.

This audit visit was conducted by the New Hampshire Department of Education as a result of several coinciding factors. First and most importantly, there have been numerous issues of concern brought to the attention of the New Hampshire Department of Education raised by parents, community members and private schools receiving students from SAU 33. The SAU has also experienced a significantly high rate of administrative turnover in the past six months. The administrative and leadership positions at the district level (Superintendent, Director of Special Education), and the building levels (High School principal and Assistant Principal, Middle School Principal and Elementary School Assistant Principal) are all new this year. There are also new building level special education coordinators. Staff throughout the district, particularly at the high school, have seen a very high rate of turnover this school year. These significant changes in leadership and staffing patterns have created uncertainty and tension witnessed by the team during the New Hampshire Department of Education Audit Visit. The visiting team believes that SAU 33 is trying to move in a positive direction, however they unanimously agree it is essential that SAU 33 administration and staff take immediate steps to bring programs into compliance, address issues related to physical facilities and clarify the direction of the system.

Activities related to this evaluation included the close review of all the teaching certifications of special education staff, analysis of SPEDIS data and random inspection of student records. Interviews were held with the Special Education Director, School Board members, building principals, regular and special education teachers, related service personnel, administrators and the Raymond Fire Chief as time and availability permitted. In addition, the team conducted parent interviews via telephone. Throughout the visit, the team had full cooperation from school personnel and this helpfulness was greatly appreciated.

The report that you are about to read represents the consensus of all members of the visiting team. Please keep in mind that this is a "report for exception", meaning that only exceptions to the NH State Standards have been addressed. If a component is not mentioned, that does not mean the team did not review it; it just means there were no citations of noncompliance to the Standards found in that particular area.

### **III. ISSUES OF SIGNIFICANCE:**

The visiting team thanks SAU 33 administration and staff for their cooperation and assistance throughout the October 3 - 6, 2000 visit. The visiting team wishes to acknowledge the hard work and commitment of staff in each school of SAU 33.

Issues of significance are defined as deficiencies that negatively impact the systematic provision of educational services for students with disabilities. The team identified numerous issues of significance throughout the district as well as specific concerns identified at the Iber Gove Holmes Middle School

#### **District-Wide Issues of Significance include :**

- Lack of policies and procedures related to all aspects of federal and state regulations for the provision of services to students with disabilities (IDEA '97, NH Standards for the Education of Students with Disabilities).

- Lack of standards based district-wide curriculum opportunities for provision of an adequate education; specifically a lack of a district wide reading curriculum
- Lack of a professional development master plan and evidence that professional development has been offered for all staff (professional and paraprofessional) related to current federal and state regulations, skill acquisition, best practices, and ongoing professional improvement.
- Lack of a clear orientation, mentoring, supervision and evaluation process for professional and paraprofessional staff.
- Lack of consistent and effective staffing patterns.
- Lack of a continuum of services resulting in a significantly high number of students placed out of district.
- Lack of communication between parents/families and the school system, particularly related to the special education process and programming. Parents expressed frustration and a lack of understanding of the system.
- Lack of district-wide transition planning.
- Lack of an up-to-date technology plan that includes coordination of existing technology, timeline for acquisition of computer hardware and software, and ongoing training for staff and students.
- Lack of current curriculum materials (textbooks are out of date, instructional materials often supplied by staff members, computers not compatible and out of date, software unavailable or obsolete, library/media books, audio/visual supplies and equipment inadequate).
- Lack of a plan to address the critical district-wide facility needs (particularly at the Lamprey River Elementary School and, most significantly at the Iber Gove Holmes Middle School).
- Lack of a district-wide improvement plan to address the numerous issues of significance discovered during this visit and initiate a collaborative effort toward immediate and continuous improvement.
- Facility that is in unacceptable condition for the provision of a safe, clean and healthy learning environment
- Facility that is not accessible and does not provide appropriate instructional space

#### **CLEAN, HEALTHY AND SAFE LEARNING ENVIRONMENT AND ACCESSIBLE AND APPROPRIATE INSTRUCTIONAL SPACES**

The teams visiting both the Lamprey River Elementary School and the Iber Gove Holmes Middle School expressed a great deal of concern regarding the condition of the facilities.

**Lamprey River Elementary School:** There is a general lack of appropriate space for instruction. Storage and makeshift learning spaces have been constructed resulting in blocked doorways and aisles that are difficult to navigate. Storage shelves in classrooms were inappropriate with materials piled on temporary metal shelving that is not fastened to the wall for support. The dental hygienist offers dental services to students inside a student bathroom area. There is no available area for confidential conversations and meetings with parents or staff. The visiting team was also concerned about the air quality and lighting throughout the building. The front doors are prone to stick shut and in the event of an emergency evacuation would create an extremely dangerous situation.

**Iber Gove Holmes Middle School:** The overall condition of the original “100” building was found to be unclean, unhealthy and unsafe. The old wooden structure does not have appropriate access for disabled individuals and in the event of an emergency evacuation, students and staff must use a narrow, metal outdoor fire escape. There are no fire doors in most of the building and no sprinkler system throughout. Flammable and hazardous materials are stored in the same space in the basement with the paper supply of the school. Many of the classroom windows do not have protective screens. There are no water or bathroom facilities available to students and staff in the building. The attic area contains bat droppings that leak through old and weakened ceiling tiles into classrooms below. The hallways include protruding hooks and shelves. The air and lighting quality is extremely poor.

The main building contains inadequate instructional, therapy, assessment and conference areas. Several of the classrooms are converted loading docks or garage spaces and rely on garage doors for access to any fresh air. One classroom doubles as the loading dock with school supplies having been delivered through the loading dock during classroom instruction; the supplies remain piled in one half of the classroom space. There is exposed wiring and frayed insulation in several areas, ceiling tiles are old with missing and broken tiles evident. Carpets and floor tiles

were found to be old, unclean and worn. Evacuation and access to and from the playground, in one part of the building, is through an old loading dock that is crowded with old desks and school equipment. There was a fuel spill during a delivery this past summer and the foundation around a conference room and at least one classroom in that section of the building was saturated with the fuel. The area continues to hold the strong odor of fuel, a significant concern for anyone with respiratory difficulties. The main building does not contain a sprinkler system. The building's general condition both inside and out is in extremely poor condition.

The modular classrooms are inadequate instructional spaces, particularly in hot and cold weather. There is no running water in any of these classrooms and students must return to the main building to use bathroom facilities. The air and lighting quality in these old and poorly maintained buildings is very poor. The modular buildings do not contain a sprinkler system.

There is no evidence of ongoing safety, health maintenance and improvements to the building and modulars in general; and most significantly to the old "100" building.

**POLICIES AND PROCEDURES FOR THE PROVISION OF A FREE AND APPROPRIATE PUBLIC EDUCATION (FAPE) AS REQUIRED BY IDEA '97 AND THE NH STANDARDS FOR THE EDUCATION OF STUDENTS WITH DISABILITIES.**

SAU 33 does not presently meet compliance with federal and state requirements for the provision of services to students with disabilities. The visiting team found a general lack of policy, procedure and understanding of current requirements in all aspects related to the provision of special education services in all schools within SAU 33. The district must provide clear leadership, support and direction, including *professional development, curriculum, appropriate staffing patterns, related materials, equipment, appropriate instructional spaces, and all the supports necessary* to implement all required aspects of federal and state regulations regarding the delivery of services to all students with disabilities.

It is also important to note that the number of students in SAU 33 identified with educational disabilities is approximately 25%, with approximately 100 additional students presently in the referral process. The average percentage of students identified in other school districts in New Hampshire is approximately 12 %. Further, the number of students placed in out of district settings was 45 at the time of the audit visit. This again represents a significantly above average number of students who require educational services that cannot be provided within the local and least restrictive settings.

**The Issues of Significance identified throughout SAU 33 encompass virtually all aspects of the district's responsibility to provide a free and appropriate public education (FAPE) to children with disabilities as required by CFR300.121 of IDEA '97. The significance of these findings cannot be overstated. The severity of the conditions must be addressed by SAU 33 with a clear and immediate plan for resolution.**

**PROGRAM(S) VISITED:**     1) Preschool Program

**COMMENDATIONS:**

- The Preschool staff support each other and work as a team.
- The Preschool Program is part of the whole school and is a caring program.
- The Preschool staff show a willingness to improve.

**CITATIONS:**

Ed1107.02     Referral

There is no clearly defined referral process in place for the Preschool Program. Staff were unclear about the exact number of SAU 33 preschool students presently identified with an educational disability. Further, they were unclear about the referral process, including transition from Family-Centered Early Supports and Services (FCESS).

CFR 300.125     Child Find

There is no formal Child Find process in place within SAU 33, resulting in a lack of assurance regarding the identification of preschool aged students with disabilities.

Ed. 1125.04     Ed. 1107.03     CFR 300.532     Evaluations

The lack of a formal referral and evaluation process results in uncertainty and inconsistency among staff regarding timelines, testing methods and the role of the FCESS in the process. The file reviewed did not contain a written consent to evaluate. Evaluations were missing in some student files. The evaluation team did not include a certified teacher of the suspected disability. The visiting team was unable to determine if evaluations are conducted during the summer months and the process for determining eligibility is not clear.

Ed. 1109.04     Procedural Safeguards

Student files contained no evidence that Procedural Safeguards are sent to parents with notice of each IEP meeting.

Ed. 1109.01     CFR300.347     CFR300.552     IEP's and Placement

There is lack of clear documentation regarding placement of preschool students with disabilities in SAU 33. The IEP's reviewed did not include how the disability affects involvement and progress in the regular curriculum, nor does it provide a statement of the extent to which preschool students will participate with non-disabled children in regular classes. Preschool student does not participate in physical education.

Ed. 1109.03     Curriculum

There is no curriculum for the Preschool Program.

CFR300.26     Programming

The transition process from Preschool to Readiness/First Grade is unclear. There is no formal transition plan.

**SUGGESTIONS:**

- The Preschool Program would significantly benefit from the addition of a full time, skillful Preschool Coordinator. There is presently no vision for preschool education and the program is significantly out of compliance in basic procedural areas related to Child Find, referral and evaluations, curriculum, programming, transition planning and access to the general curriculum. A Preschool Coordinator could assume responsibility for the establishment and implementation of all required policies and procedures.

- Work to create a clear communication system and a successful partnership with the families of preschool students.
- Improve the overall program design including connection to current best practices in preschool education. Review staffing patterns, class sizes, program options (community based, in-school program), Least Restrictive Environment (LRE) and continuum of services.
- Formalize team planning times for teachers, related service providers and paraprofessionals in an effort to create collaborative instruction and integrated therapies.
- Create an ongoing professional development plan relative to all aspects of preschool programming. These professional development opportunities should be made available to all preschool staff, including teachers, related service providers and paraprofessionals.
- Provide a clear and meaningful system of supervision, evaluation and support to all paraprofessional staff.
- Furnish community providers with appropriate professional development related to all aspects of the special education process.
- Review the current community based preschool programs to insure that the programs are appropriate and capable of providing the environment and supports necessary for any student with a disability who may be placed there. Create an ongoing system of communication with community based preschool programs.

**PROGRAM(S) VISITED:**     1) Grade 1 Resource Program   2) Grade 3 Resource Program

**COMMENDATIONS:**

- The staff and administration were very welcoming and accommodating to the visiting team.
- The reasonable class sizes at the Lamprey River Elementary School are beneficial for student learning.
- The school encourages an atmosphere of respect among staff and students. The students were polite and respectful at all times.
- The new playground is a positive addition to the school.

**CITATIONS:**

Ed. 1103.01    Ed. 1103.02    Ed. 1103.03    Child Find

There is no formal Child Find program in SAU 33. There has been no coordinated effort to insure that all potential students with disabilities residing in Raymond are referred to the special education evaluation team. There is no clear in-school referral procedure for students age 3 - 21 who are suspected or known to have an educational disability. There is no formal process through which information is disseminated to the community that describes the child find program, including a contact person in the school system for further information or referral. Further, there is no clear program to identify students placed in homes for children, health care facilities, or state institutions for which a special education program may be appropriate.

Ed. 1107.02    Referral Process

There is no clearly followed process for referral and evaluation that includes individual participants responsible for decision-making and implementation and includes all the required components.

Ed. 1109.01    IEP Components

The IEP reviewed did not include the following components: 1) statement of how the disability affects involvement and progress in the general curriculum; 2) location of the services and modifications; 3) identification of LEA representative; 4) measurable annual goals; 5) participation in state or district assessments and 6) documentation of regular educator present at meeting.

Ed. 1109.04    Notice of IEP Meeting

There was no evidence that parents are provided ten-day notice of an IEP meeting including purpose, time, location and a list of invitees. Procedural safeguards are not given at each notice of an IEP meeting.

Ed. 1115.04    Ed. 1115.06    Placement

There is no evidence that Least Restrictive Environment is determined based on a continuum of services available.

Ed. 1109.11    Progress

There is inconsistent evidence of regular and systematic monitoring of IEP's.

Ed. 1123.04    Confidentiality

There is no public listing of the names and positions of those employees who have access to personally identifiable information.

Ed. 1119.03    Curricula

There is no established curriculum in place within SAU 33. This results in great inconsistency between grade levels as students move through the system. Most significantly, there is no reading curriculum. This has a significant impact on the reading levels of students throughout the district resulting in below grade level reading scores for a large percentage of students. There is no district curriculum coordinator to ensure standardization, developmentally appropriate methods, materials and instruction and to connect the district's curriculum to the New Hampshire



Curriculum Frameworks. Further, there is no evidence of a special curriculum designed to meet the needs of students who are unable to access the general curriculum.

<b>Lamprey River Elementary School, Continued</b>
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Ed. 1119.04      Equipment, Materials, and Assistive Technology

There is a significant lack of up-to-date equipment and materials evident throughout the district. Teachers provide many of the materials and supplies found in their classrooms. There is no clear district-wide technology plan and a lack of current computer hardware and software.

Ed. 1119.06      Facilities and Location

There is a severe space shortage at the elementary school resulting in overcrowded classrooms with cramped aisles and temporarily blocked doorways. Materials are stored everywhere, including the center of the library, and the dental technician must use a bathroom space to offer dental hygiene services to students. The visiting team felt that the air quality in the building was inadequate and the lighting was very poor in classrooms. The once open concept building has been gradually enclosed with partitions that are not soundproof resulting in noise levels that are distracting in certain areas. There is no space available to hold confidential meetings with parents and other staff members.

**SUGGESTIONS:**

- Professional Development training sessions should be developed for all staff to address all areas of the special education process (particularly in areas of noncompliance) and to provide staff with information and a connection to best practices in instruction, curriculum, collaboration, mentoring of new staff, etc.
- Paraprofessional staff should be provided with clear orientation, training, mentoring/supervision and support so they can perform their jobs in a fully informed and competent manner. They should not be expected to cover classes for absent staff if this would interrupt services they provide to students. Paraprofessionals should not be writing their own lesson plans for students but should be working collaboratively with professional staff to implement student plans.
- Create clear opportunities for teaming and collaboration among staff. There is presently no clear design that allows for the communication and planning necessary if special and regular education teachers, related service staff and paraprofessionals are to work together.
- Create a clear transition plan and process for students as they move from preschool to Readiness or first grade and beyond. Transition planning should extend to include all transitions as students continue to move from one grade to another. Provide a clear structure and expectation for smooth transitions that will connect the development of IEP's to the next year's teachers and curriculum. Include parents and students in the planning for and anticipation of each transition.
- Review current staffing patterns to determine how best to maximize the current staffing resources available and to begin planning for future staffing needs.
- Consider short term and long term plans for the improvement and maintenance of the school facility. The question of air quality, lighting, crowding, appropriate instructional and meeting spaces, etc. should be addressed by a district committee that includes all relevant stakeholders.
- Consider the addition of a new school social worker position in an effort to improve communication and to help bridge the distance between home and school.
- Create a clerical support position to assist the special educators with the extensive paperwork and communication requirements.

- Parent's interviewed seemd to have a lack of understanding of special education programs and processes. There does not appear to be a vehicle for ongoing parent forums or information distribution. Consider ways to provide parents and families with a greater connection to the elementary school so that comfortable partnerships can develop.

**PROGRAM(S) VISITED:** 1) Resource Programs 2) EH Program  
3) Life Skills Program

**COMMENDATIONS:**

- The Iber Gove Holmes staff care about making improvements for students.
- The staff are trying hard under difficult circumstances.
- There are some classes that appear to be working for students with disabilities.

**CITATIONS:**

Ed. 1103.01 Ed. 1103.02 Ed. 1103.03 Child Find

There is no formal Child Find program in SAU 33. There has been no coordinated effort to insure that all potential students with disabilities residing in Raymond are referred to the special education evaluation team. There is no clear in-school referral procedure for students 3 through 21 suspected or known to have an educational disability. There is no formal process through which information is disseminated to the community describing the childfind program, including a contact person in the school system for further information or referral. Further, there is no clear program to identify students placed in homes for children, health care facilities, or state institutions for which a special education program may be appropriate.

Ed. 1107.02 Referral Process

There is no clearly followed process for referral and evaluation that includes individual participants responsible for decision-making and implementation and includes all the required components.

Ed. 1107.01 Ed. 1107.02 Ed. 1107.03 Ed. 1107.05 Ed. 1125.04 Evaluations

The evaluation process, in all areas, is significantly lacking clear processes and procedures. The reviewers were unable to locate written consents to evaluate, written notice of referral to parents, evidence that appropriate testing instruments and a variety of assessment tools were utilized, multidisciplinary criteria for the evaluation team, evidence that evaluations are current (unclear process for determining triennial evaluations) and evaluation summary reports.

CFR300.534 Ed. 1107.07 Determination of Eligibility

The team was unable to identify that an appropriate process is used that includes all members (parents, regular educators, special educator certified in the area of suspected disability, and LEA representative) to determine eligibility.

CFR300.345 CFR300.504 Ed. 1109.04 Notice of IEP Meeting

There is no record that parents were provided with a 10-day notice of IEP meetings or that they were notified regarding the meeting's purpose, time, location and invitees. For students age 14 or 15, there is no evidence that the meeting's purpose is to develop a statement of transition services and that the student was invited. There is no evidence that parents are provided with a copy of procedural safeguards at the notice of each IEP meeting.

CFR300.347 Ed. 1109.01 IEP Components

IEP's lack numerous components, including those required by IDEA '97 Amendments. The lack of documentation related to the following list indicates that the general process for developing and implementing IEP's is significantly compromised: 1) there is no evidence of how the student's disability affects involvement and progress in the general curriculum, 2) no explanation of the extent to which the student will not participate with non-disabled students in regular classes, 3) there are no measurable annual goals with benchmarks or objectives, 4) no evidence that students were involved and that steps were taken to ensure their interests were taken into account, 5) no evidence of transition planning, 6) no evidence of consideration of students participation in state-wide or district-wide assessments, 7) no statement of how progress will be measured and how the parents will be informed of their child's

progress toward the annual goals. Progress reports were incomplete and the process for determining Extended School Year is not completed by 4/30 or 60 days before starting.

Ed. 1109.03     Team Composition

It is unclear if the team compositions for Evaluations, Determination of Eligibility, IEP and Placement are appropriate.

CFR300.347     Ed. 1109.11     IEP Progress

There is no evidence of regular and systematic monitoring of IEP's and it is unclear if parents are informed of progress on IEP annual goals at least as often as they are informed of their non-disabled children's progress.

CFR300.572     CFR300.563     CFR300.504     CFR300.503     Ed. 1123.04

Confidentiality and Procedural Safeguards

There is no public listing of the names and positions of those employees who have access to personally identifiable information. There is no evidence that a Record of Disclosure in the files is utilized. Annual notice of Rights are not given to parents at each notification of the IEP meeting.

Ed. 1119.03     Curricula

There is no established curriculum for the middle school or throughout the district. The lack of a district-wide reading curriculum interferes with the smooth and ongoing acquisition of skills at each grade level, and has a particularly deleterious effect on the students as they reach middle school level where students are often unable to read at the expected grade level for content (staff report that between 40 and 50% of the middle school students are reading below grade level). Further, there is no curriculum designed for the self-contained special education programming at the middle school, for those students who may be unable to access the general curriculum.

Ed. 1119.04     Equipment, Materials, and Assistive Technology

There is a significant lack of up-to-date equipment including technology and materials provided at the middle school. The textbooks are significantly outdated and teachers supply much of the materials found in the classrooms. The availability of print, audio and visual materials found in the library is not adequate for the student population, grade, age range and size of the school.

Ed. 1119.06     Ed.306.03     Facilities and Location

There are serious issues related to health and safety at the middle school. The original "100" building does not have bathroom facilities or running water for any of the classrooms, the area above the ceiling tiles on the second floor contains bat droppings. The old, weakened ceiling tiles leak when the roof above does and bat droppings have seeped through into the classrooms. Many of the windows in the building (including windows and doors on the second floor) do not have protective window screens and are a hazard for staff and students. The emergency evacuation plan does not take into consideration the inaccessibility of the building for students or staff with disabilities and relies on evacuation down a narrow, metal fire escape. The building is an old wooden structure with no fire doors in key areas and no fire wall stops in the walls. There are flammable materials stored together with the school's annual paper supply in the basement. This storage space is adjacent to a workshop where machine work is done and a gasoline powered snow blower is stored. The air quality and lighting in the "100" building was noted to be unacceptable. The middle school as a whole is in a state of disrepair with inadequate learning spaces found throughout the building. One classroom doubles as a loading dock for supplies and the only ventilation is from the loading dock door. Supplies have been unloaded from the truck into the classroom while instruction is occurring. Two other classrooms also rely on garage doors as their only source of fresh air. Other classrooms have poor air quality, poor lighting, and insufficient space for learning to occur. The modular classrooms are poorly ventilated, are not provided with running water, adequate heating or cooling systems. The staff report that in warm weather, the modulares become extremely hot and uncomfortable. A fuel spill during the summer resulted in the saturation of fuel in the foundation of part of the main building, leaving a strong and pervasive odor of fuel in a conference room and the adjacent industrial arts classroom. The area used for assessment of students with disabilities is inappropriate for that purpose. There is no ventilation, poor lighting, poor sound and no opportunity for confidentiality. The stage area is used for the provision of individual physical therapy and is inappropriate for that purpose. There are exposed wires, an access area for students is crowded with equipment and supplies, and hallways that include protruding

coat hooks and shelves. Overall, the facilities at the middle school are inappropriate and unsafe for adequate instruction to take place.

**SUGGESTIONS:**

- Review all aspects of the present Life Skills Program and create a plan for revising the model as it currently exists. The program presently has no curriculum, entrance or exit criteria and students lack access to the general curriculum. The staffing patterns for the program are unclear and the quality and amount of instruction offered to students is uncertain. Visit other middle schools with programs for students with developmental disabilities for ideas related to integrated programming.
- Create a long-range professional development plan that addresses the wide array of issues relevant to quality middle school programming and instruction for all students.
- Consider developing a true middle school model with opportunities for genuine teaming, advisories, interdisciplinary curriculum components, collaborative instruction (including the provision of therapies), block scheduling, looping, etc. A planning team should visit other middle school models in the area to gather ideas regarding best practices of effective middle schools.
- Work in collaboration with the other district schools to begin addressing all critical transition issues (curriculum, programming, communication with parents, inclusion of students in planning, etc.).
- Review staffing patterns throughout the middle school to determine if the existing staff resources could be reallocated in any way to provide more effective programming as well as more effective collaboration.
- Create clear and reliable systems for mentoring, supervising and evaluating new staff.
- Create a clerical support position to assist special educators with the extensive paperwork and communication requirements.
- Consider establishing middle school celebrations to recognize the success of students, staff and programs.
- Seek opportunities to connect in a meaningful way the Iber Gove Holmes Middle School and students to the community through community service projects and expanded volunteer efforts.
- A new partnership with key stakeholders would provide a means to explain and clarify the needs of the middle school to the community. It is critical to create opportunities for solution finding with all significant voices and ideas represented at the table.

**PROGRAM(S) VISITED:**     1) Resource Program    2) Emotionally Handicapped Program  
3) Life Skills Program 4) Modified Instruction

**COMMENDATIONS:**

- The Raymond High School staff are caring and helpful.
- The Raymond High School facility is well maintained and attractive.
- The Raymond High School students were respectful and behaved in an orderly manner. There were very few students in the hallways during class times.
- The Raymond High School staff were very helpful to the visiting team and open to discussion about programming, staffing needs and other issues at the school.

**CITATIONS:**

**The Visiting Team experienced a great deal of difficulty in reviewing the student records at the Raymond High School as there is no clear system of organization and several key documents were not in evidence. The overall poor condition of the student records further contributes to the numerous and systemic issues of noncompliance relative to virtually all aspects of the federal and state regulations related to the provision of services for students with disabilities.**

Ed. 1103.01    Ed. 1103.02    Ed. 1103.03    Child Find

There is no formal Child Find program in the district. There is no clear in-school referral procedure for students 3 through 21 who are suspected or known to have an educational disability.

Ed. 1107.02    Referral Process

There is no clearly followed process for referral and evaluation that includes individual participants responsible for decision-making and implementation and includes all the required components.

Ed. 1107.01    Ed. 1107.02    Ed. 1107.03    Ed. 1107.05    Ed. 1125.04    Ed. 1113.01

Evaluations

The evaluation process was found to be in serious disarray. The records reviewed revealed missing evaluations in several files. Further, records revealed a significant lack of correct procedure with each aspect of the evaluation process including: lack of consent to evaluate, lack of appropriate testing instruments, lack of correct evaluation summary, lack of vocational evaluation, lack of correct multidisciplinary team, lack of correct timeline, lack of evidence that parents are part of the process.

Ed. 1107.07    Determination of Eligibility

The correct process for determining eligibility was not in evidence in Raymond High School student records.

CFR300.345    Notice of IEP Meeting

For students age 14 or 15, there is no evidence that the meeting's purpose is to develop a statement of transition services and that the student was invited. For students age 16 or older, the notice does not indicate the purpose of the meeting is to consider the needed transition services, invite the student and identify other agencies that are invited.

CFR300.347    Ed. 1109.01    IEP Components

The IEP's lack numerous components, including all new components required by IDEA '97. The lack of documentation related to components of the IEP indicate that the general process for developing and implementing IEP's is significantly compromised. Significantly, there is no evidence that regular educators have a role in the development of IEP's. It was reported to the visiting team that some high school educators have refused to implement IEP's. The distribution or system to insure that all relevant staff have access to student IEP's is unclear.



Ed. 1109.03    Team Composition

There is no documentation indicating that team compositions for Evaluations, Determination of Eligibility, IEP, and Placement are appropriate.

CFR300.347    Ed. 1109.11    IEP Progress

There is no evidence of regular and systematic monitoring of IEP's. There is no evidence that parents have been informed of their child's progress on IEP annual goals.

Ed. 1119.03    Curricula

There is no established curriculum for the high school or throughout the district. There is no curriculum in place for students who are unable to access the general curriculum.

CFR300.344    1109.03 Regular Education Involvement

There is no evidence of the role of the regular educator in any of the special education processes, including evaluations, determination of eligibility, development of the IEP, monitoring of the progress toward annual goals of the IEP, or placement.

Ed. 1119.08    Diplomas

Not all students with educational disabilities have equal opportunity to complete a course of studies leading to a high school diploma.

CFR300.519-526    Ed. 1119.11    Suspension

There is no clear and consistent procedure in place that assures students their rights as related to suspension issues.

Ed. 1115.01    Ed. 1115.04    Ed. 1115.07    CFR300.306    Least Restrictive Environment

There is no evidence to show that the least restrictive environment is addressed annually or a process that insures that students with disabilities will participate to the maximum extent possible, including non-academic and extracurricular activities.

Ed. 1113.01    Ed. 1113.02    CFR300.26    CFR300.347    Vocational Education

There is no clear documentation indicating that Vocational Evaluations are conducted when needed or that a vocational component is part of the student's IEP.

Ed. 1119.09    Supervision and Administration

It is unclear if students with educational disabilities are provided with the opportunity to continue in an approved program until such time as the student has acquired a high school diploma or has attained the age of 21. The extended school year programming is not provided at an appropriate level.

Ed. 1119.07    Qualifications of Service Providers

The high degree of staff turnover results in new, inexperienced and in some cases, uncertified personnel for the area to which they are assigned. There has been no systematic, ongoing professional development plan to address the issues of high staff turnover as well as to provide all staff with current information regarding state and federal regulations, best practices and current trends in curriculum development.

Paraprofessional staff are covering classes or duties for other absent or busy staff, thus taking them away from their assignments and work with students who have educational disabilities and require their support as detailed in the IEP.

**SUGGESTIONS:**

- Provide ongoing professional development opportunities for all regular and special education professional and paraprofessional staff.
- Revise the present student record filing system and create a manageable and organized system. Review other systems used effectively by area high schools.
- Create a clerical support position to assist with the extensive paperwork and communications associated with the special education process.
- Create clear job descriptions for all staff with expectations for collaboration clearly defined.
- Create a district wide manual for all special education policies and procedures, with training provided, so that all staff are operating from the same system.
- Visit other high school programs to seek ideas and solutions for all aspects of process, programming and collaboration that is critical for the success of today's high school education.
- Review all present programming models to determine if access to the general curriculum is offered and to determine if the present models are appropriate, effective and the best use of existing resources.
- Review course offerings to determine if the present courses should be revised in any way. Consider distance learning opportunities as a way of extending the curriculum and offering advanced placement courses for eligible students.
- Review the current equipment, technology, books and materials to determine if a long term plan and budget could be implemented for the necessary acquisition of all supplies so that curriculum can be implemented and students can have equal access to the current technology and information available today.
- Align the high school curriculum with the New Hampshire Curriculum Frameworks.
- Create a system that includes representatives from all relevant stakeholders that will address a long-range plan for the high school, including such components as: effective and meaningful communication and collaboration among regular and special education staff, the establishment of current and effective curriculum, the meaningful involvement of students in the development of their education planning as well as transition planning, the connection to the community to build relationships for students and staff, etc.
- Create a student advisory council to consider issues and solutions on topics such as safe schools, drop out rates, peer mentoring, inclusionary practices, and other student related concerns.

# **ADDENDUM**

## **JAMES O. MONITORING PROGRAM**

**SAU 33**

**Student File Review**

**Case Study Document**

**Reimbursement Claim Form**

**Case Study Addendum Form**

<p style="text-align: center;"><b>ADDENDUM</b> <b>JAMES O. MONITORING PROGRAM</b></p>
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**SAU 33**

**NUMBER OF FILES REVIEWED:** 2 FILES

**COMMENDATIONS:**

There are no commendations at this time.

**CITATIONS:** (in numerical order)

The two files reviewed were completely inaccessible to the readers. The files did not have any system of organization and virtually all documents required to complete the James O. Monitoring Program review were either not located, or did not exist. One record reviewed included information on two different students who happened to share the same first name. Records were in such a significantly serious state of disarray that the reviewers abandoned any attempt to locate the required information after several hours.

**SUGGESTIONS:**

- Identify an out of district coordinator to address and correct the many issues related to the extensive pattern of noncompliance discovered in the records of students placed in court ordered out of district placements.
- Create and follow clear policies and procedures for all aspects of state and federal regulations for the education of students with educational disabilities.
- Create a clear and consistent system of record keeping that accounts for all aspects of the special education process, particularly as it relates to the placement of court ordered students.
- Immediately assign a knowledgeable certified special educator to organize existing student records.
- Correct all issues of noncompliance related to the New Hampshire Standards for the Education of Students with Disabilities and IDEA '97.